

TSDAC Phase III Working Group Draft Final Report

Comments and Responses

May 21, 2014

#	Section	Comment	PB Response	Report Edit
1	Data Collection and General Comment	User side subsidy trip-makers were also referenced in the "data collection" discussion, and more particularly that those types of trips are not accounted for in the operating assistance allocation model. While user side subsidy service delivery approaches are accorded significant (and appropriate) attention in later sections of the report discussing both "congestion mitigation" and "service to transit dependents", I think the absence of any discussion about user side subsidies in the "data collection" portion of the report is an omission that needs to be rectified. This issue got only peripheral attention during the working group discussion so it seems to me that the working group needs to decide, in the course of finalizing reactions to the draft report, what the working group wants to recommend with regard to this issue. Should "user side subsidy" trips and costs be included in the size weighting factor, and should the "user side subsidy" trip-making also play a part in the "performance-based allocation" calculations? (PRTC)	The Data Collection section of the report has been modified to acknowledge the reference during the Working Group's data collection discussion. However, as noted, the Working Group did not assess the issue of including user-side subsidized trips and their costs in the allocation formula. The pilot programs recommended for congestion mitigation and service to transit dependent populations would be funded through the Demonstration Project Assistance program. The issue of including such trips and their subsidies in the operating assistance allocation model should await the results of those pilots and a subsequent determination of their value in achieving program goals and consistency with public transit policy.	Modified the text of the report to acknowledge the reference on page 12: "The subject of user-side subsidized trips (and their associated costs) was referenced during the data collection discussion. (One agency currently provides user-side subsidies, funded by a third-party grant, for some taxicab trips.) While user-side subsidies are included within the pilot programs recommended to be funded through the Demonstration Project Assistance program, the issue of whether these trips and their subsidies should be included as a component of ridership and operating expense data for use in the operating funding allocation model was not deliberated by the Working Group."
2	Data Collection	The concern expressed by some of the working group members that ridership and fare collection equipment may be assigned a lower state participation rate if it is purchased independent of the vehicle is acknowledged on page 8, but the draft report does not corroborate whether that's so and, if it is so, offer a recommendation. My sense of the sentiment of the working group was (is) that equipment of this sort should qualify for the same state participation rate in either event, so the report should verify whether participation rates do vary and if they do, recommend that this be changed. (PRTC)	<p>The data collection chapter states on pg 8 that data collection technology acquired with vehicle purchases and/or implemented systemwide is funded at the highest state participation rate (Tier 1). However, if the new technology is acquired later and/or is not implemented systemwide it may be assigned a lower state participation rate (Tier 3). And the draft report notes: "This may be a disincentive to implementing data collection technology improvements not tied to new vehicle purchases."</p> <p>The draft report also includes recommendation on pg 25: to create "a pilot program, funded at the highest state matching level (Tier 1) to assist agencies in the acquisition of more advanced data technologies (equipment and/or software) and assessment of the value of using these technologies-without having first to commit to a systemwide acquisition."</p>	<p>Additional clarifying language was added to the text regarding current practice on page 8: "Under DRPT's tiered capital allocation approach, data collection technology acquired with vehicle purchases and/or implemented systemwide receives the highest state participation level of funding (Tier 1.) However, new technology acquired later and/or not implemented systemwide may only qualify for a lower state participation level (Tier 3.) This may be a disincentive to implementing data collection technology improvements not tied to new vehicle purchases."</p> <p>Added a recommendation on page 25: "Create a pilot program, consistently funded at the highest state matching level (Tier 1), to assist agencies to acquire more advanced technologies (equipment and/or software) for required data collection purposes and assess the value of these technologies, including the resources needed and other implications. without having first to commit to a systemwide acquisition."</p>
3	Data Collection	The table on page 14 shows that small/rural agencies will move to simple electronic systems in three years – how will that be funded? (Arlington County)	See response to comment #2 above.	See #2 above.

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4	Data Collection	On page 18, would recommend that the paragraph following the recommendation related to "DRPT taking an extra step" be moved to and included in the recommendation. (Loudoun County)	Agreed. Made appropriate edits to the report.	Moved the following text to the Recommendations box on page 18: "DRPT can take an extra step to ensure consistency and accuracy in the processing of raw data by creating simple, pre-formulated spreadsheets that provide a template for organizing data, and automatically calculate monthly and annual totals."
5	Data Collection	On page 18, I also recommend including paragraph 1, beginning with "DRPT can take the extra step" in the recommendation. Also, the paragraph on page 19 just before Figure 2.2, lines 6, 7 and 8, beginning with "Additionally, the OLGA reporting system..." should be relocated in the recommendation as well. (Fairfax County)	Not allowing entry of data that is outside of the thresholds compared to the previous year's data without an explanation is already part of the OLGA recommendations (see large Recommendation box on p. 25 at the end of section 2.4.3).	No change to text needed.
6	Sizing of Transit Systems	I agree with the characterization of the Sizing discussion beginning on page 27 accurately reflects the sentiment of the working group majority. However, I'm not part of that majority. At some future juncture, assuming that the legislature and governor press for additional focus on addressing Need in transporting the Transit-Dependent, a third factor will have to be added to the sizing matrix. Otherwise, economically-impacted communities will have no prospect to increase their funding to transport transit-dependent residents, since they can't support increased operating expenses and have little opportunity to significantly boost ridership. (Arlington County)	Made appropriate edits to the report to acknowledge this point.	Added the following text on page 29: "In addition, some members of the Working Group noted that in the future, a third factor may need to be included for sizing systems aimed at supporting transportation for transit dependent populations. Such a factor would enable increased funding assistance to economically-impacted communities that have little prospect of supporting increased operating expenses or enhancing ridership on services to transit-dependent residents."
7	Exceptional Performance	The preface to this discussion in the draft report (on page 30) overstates the sentiment expressed by TSDAC, in my view. TSDAC did conclude that the operating assistance allocation formula as adopted might have the unintended consequence of penalizing transit systems that are already highly proficient (by virtue of its reliance on performance changes compared to statewide averages), calling for this issue to be researched further, but it reserved judgment on whether the research would bear out that concern. So I would amend the language in the preface that says TSDAC made an "unfair" declaration, so the working group recommendation is not perceived as though it is somehow at odds with what TSDAC previously concluded. (PRTC)	Agreed. Made appropriate edits to the report.	On page 30 of the report, changed text to: "TSDAC wanted to investigate if the application of the current operating allocation formula was resulting in such a penalty for exceptional performers. Additionally, in case such a bias against exceptional performers was found to exist in the current formula allocation, TSDAC directed DRPT to consider including a measure that would instead identify and reward exceptional performers."
8	Exceptional Performance	I think the phrasing of the first sentence in the "Step 1" discussion on page 33 needs to be amended. Here's how I think that first sentence should read: "This step involved identifying all transit agencies with performance gains in the FY 2011 thru FY 2013 period that were lower than the statewide average for each performance metric." I'm suggesting this change because I don't think the performance changes were necessarily declining – they were just lower than the statewide average. (PRTC)	Agreed. Made appropriate edits to the report.	Made suggested text change on page 33 of the report.

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9	Congestion Mitigation	Relieving congestion is another objective of the legislature. Meaningful transit alternatives in corridors with significant traffic congestion tend to be expensive to operate (as cited on page 46) – likely requiring additional financial resources. Consequently, a number of funding methods should be considered aside from reviewing the sizing matrix. The pilot program in Chapter 5 – if targeted towards increasing mode-share in congested corridors – is a good approach. The discussion in Section 5.3.1 should be revisited after completion of a Virginia Center for Transportation Innovation and Research for VDOT Arterial Performance Study. This study is to identify a methodology to identify and prioritize the most congested locations within the state. A draft report may be out in 3-4 months. Pilot projects probably should initially be focused on those locations. (Arlington County)	Since the VDOT Arterial Performance Study is not expected to be released before the finalization of this report, no further action will be taken at this time in response to this comment. However, this issue may be revisited by TSDAC and the Transit Agency Working Group at a later date.	No change to text needed.
10	Transit Dependent Populations	<p>The characteristics specified for qualifying populations (pages 51-52) should not be read as though they are rigid, because grantees may want to define a targeted transit dependent population more narrowly. I suggest that the characteristics be described as “boundary” conditions that grantees can narrow if they wish. So long as the grantee’s prescription for the target population falls “within” these boundaries, that should be allowable. (PRTC)</p> <p>All transit systems have transit-dependent residents – and we are incentivized by the prospect of full buses, full fareboxes, and Title VI compliance to serve them. However, systems in economically-distressed communities don’t have the latitude to serve them that the rest of us do. However, I do agree with the discussion and other conclusions in Chapter 6 regarding an interim pilot program for the Transit Dependent. Given that a logical requirement of the grant would be to continue a successful project with local funding, allowing all transit recipients to apply makes sense. Low-income communities are relatively unlikely to apply, so the pilot will have to be demonstrated elsewhere in the State. Also, due to varying residential patterns and social service priorities in middle income communities, encourage allowing limited flexibility in defining the Transit-Dependent makes sense as well. (Arlington County)</p>	<p>Agreed that eligibility should be flexible to serve a subset of transit dependent persons even if all target populations are not served. However, priority should be given to proposed programs that serve multiple categories of transit dependent persons.</p> <p>See response to comment #10 above.</p>	<p>On page 51 of the report, changed text to: “Quantitative measures describing transit dependent populations should include one or more of the following. Priority will be given to proposed programs that serve multiple categories of transit dependent persons as defined below.”</p> <p>See response to comment #10 above.</p>

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11	Transit Dependent Populations and Congestion Mitigation	The draft report observes that pilot projects funded by these programs warrant support for two years, in part because projects launched under pilot program such auspices don't qualify for conventional state assistance until two years after they've started. This observation doesn't account for the fact that VDRPT has made start-up funding available for new services in the same year as they are anticipated to start (e.g., Dulles Silver Line service). It seems to me that VDRPT's start-up funding practice needs to be acknowledged, with clarification as to the circumstances prompting VDRPT to provide such funding. (PRTC)	Added a footnote to the report to clarify the difference between the proposed funding pattern for these programs and DRPT's existing start-up funding practice.	In the Transit Dependent Populations section, edited Grant Duration bullet on page 55 to state "a two-year assistance program would be adequate given the two-year lag between start of service and the receipt of operating assistance calculated on the basis of the operating cost and ridership associated with that service." Added a footnote to that sentence reading as follows: "DRPT's current practice is to provide startup operating assistance for transit agencies' expansion transit services during the first two years of service based on the budgeted operating expenses and projected ridership. In year 3, startup service become eligible for formula operating assistance funding from DRPT based on the service operated two years prior (i.e., the first year of the funded service). In the case of the Transit Dependent Grant Program, funded services are not anticipated to receive startup operating assistance during the first two years of service, as the Transit Dependent Grant Program funding will be at the maximum state participation rate. However, Transit Dependent Grant Program funded service will transition to normal state operating assistance in year 3 of service." Similar edits to Congestion Mitigation on page 47 of the report.
12	Transit Dependent Populations	On page 53, Section 6.3.1, Goal of the Potential Transit Dependent Program, lines 6, 7 and 8 states, "The Working Group acknowledged that this task should address services that are not necessarily efficient or effective but that have a public service goal, such as serving a low-income ridership stop/activity center like a hospital." In my opinion, this is inconsistent with the wide-ranging, main findings from the Working Group beginning in Section 6.2.1 (page 50), bullet points 1 and 3. Also, it's inconsistent with the Eligible Programs expressed in bullet point 1 on page 55. I contend that the public service goal noted in the aforementioned quote should be consistent with the broad goals expressed throughout this chapter. (Fairfax County)	This type of service is intended to be consistent with the overriding goals and objectives of the program, so the main findings on pages 50 and the eligible programs on 55 have been edited to include service to vital community activity centers such as a hospital. The statement on page 53 regarding the efficiency or effectiveness of such services may be confusing, so we have removed that language from the report.	Bulleted examples of potential programs on page 50 edited to include "improved transit service for transit dependent individuals, including service to vital community activity centers." Goal of the Potential Transit Dependent Program on page 53 restated as "The Working Group acknowledged that this task should address services that have a public service goal, such as serving a vital activity center like a hospital." Eligible programs on page 55 edited to include "providing service to vital community activity centers (such as a hospital)."

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13	General	A general comment would be to add some language to the key recommendations section in the beginning of the document that would stress the important leadership role that DRPT has in providing the resources for data collection, both reference materials and funding. I know that we discussed having one "expert" point of contact at DRPT, but it would be helpful if all of the Program Managers were well-versed and able to respond to inquiries related to data definitions and collection practices, and the OLGA related requirements. (Loudoun County)	Agreed. Added a Next Steps section (1.3) at the end of the Introduction to outline key steps DRPT must take to implement these recommendations.	Added section 1.3, Next Steps, on page 4: "DRPT has a key leadership role in implementing the recommendations of the Working Group, in terms of funding, administration, oversight, and technical assistance. Program Managers and other key points of contact for transit agencies within DRPT must be well-versed in the updated data collection practices and commensurate changes in OLGA. The proposed pilot programs addressing congestion mitigation and transit dependent outcomes may be implemented administratively by DRPT, but will require appropriate prioritization within available funds to become a reality. Implementing new programs and protocols will require concerted effort by staff, in addition to existing responsibilities. Local transit agencies are likely to have questions about these recommendations and any new funding programs, and DRPT staff must stand ready to provide appropriate technical assistance to address these queries. In short, the successful implementation of these recommendations demands careful attention by DRPT management and staff."